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ATTORNEYS FOR DEFENDANT
MMTREND LLC

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BIAGGIO SHIPHOLDING S.A.,

Plaintiff,

-against-

MMTREND LLC,

Defendant.

08 Civ. 3236 (JGK)

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT upon the Affirmation of Michael J. Frevola dated June 6, 2008 and the accompanying Memorandum of Law in Support, and all pleadings heretofore had in this matter, Defendant Mmtrend LLC will move this Court, before the Honorable John G. Koeltl, United States District Judge, at 500 Pearl Street, Courtroom 12B, New York, New York, on a date to be set by this Honorable Court, for an order pursuant to Rule E(2)(b) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, directing (a) Plaintiff Biaggio Shipholding S.A. to give security for attorneys' fees costs

to Mmtrend within 10 days from the issuance of the order; and (b) directing such other and further relief as the Court may deem proper.

Dated: New York, New York
June 6, 2008

HOLLAND & KNIGHT LLP

By: 

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